

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION

IN RE:	:	Chapter 13
Robert Walter Blaszak, Jr.	:	CASE NO.: 5:21-bk-02301-MJC
aka Robert W. Blaszak, Jr.	:	
aka Robert Walter Blaszak	:	
aka Robert Blaszak	:	
aka Robert Blaszak, Jr.	:	
dba Mr. Sandman Hardwood Floors	:	
aka Robert W. Blaszak	:	
	:	
Debtor,	:	
<hr style="width: 50%; margin-left: 0;"/>		
Wilmington Savings Fund Society, FSB not	:	
individually, but solely as trustee for	:	
Residential Mortgage Aggregation Trust,	:	
	:	
Movant,	:	
	:	
v.	:	
	:	
Robert Walter Blaszak, Jr.	:	
aka Robert W. Blaszak, Jr.	:	
aka Robert Walter Blaszak	:	
aka Robert Blaszak	:	
aka Robert Blaszak, Jr.	:	
dba Mr. Sandman Hardwood Floors	:	
aka Robert W. Blaszak	:	
Allison Wolf, Co-Debtor	:	
	:	
Jack N Zaharopoulos	:	
Respondents.	:	


**DEBTOR'S ANSWER TO MOTION FOR RELIEF OF
WILMINGTON SAVINGS FUND SOCIETY, FSB, NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR RESIDENTIAL
MORTGAGE AGGREGATION TRUST**

1. Admitted.
2. Admitted.
3. Admitted.

4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Denied. This paragraph represents a legal conclusion to which no response is required.
10. Denied. This paragraph represents a legal conclusion to which no response is required.
11. Denied. The post-petition history attached as an exhibit to the motion fails to take into account all payments made by Debtors.
12. Denied. See answer to #11.
13. Denied. After reasonable investigation, Debtor is unable to verify the amount of the outstanding principal balance, and therefore this claim is denied.
14. Admitted in part and denied in part. It is admitted only that the value of the property at the time of the filing of the petition was the amount set forth in the petition. The remaining allegations in this paragraph are denied as legal conclusions to which no responses are required.
15. Denied. This paragraph represents a legal conclusion to which no response is required.
16. Denied. This paragraph represents a legal conclusion to which no response is required.
17. Denied. This paragraph represents a legal conclusion to which no response is required.

WHEREFORE, Debtor, Robert Walter Blaszak, Jr., respectfully requests the Motion for Relief be denied.

NEWMAN WILLIAMS, P.C.

By: 
Robert J. Kidwell, Esquire
Attorney for Debtor

Date: May 23, 2024